

GIBSON, DUNN & CRUTCHER LLP
Orin Snyder (*pro hac vice*)
osnyder@gibsondunn.com
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035

Kristin A. Linsley (SBN 154148)
klinsley@gibsondunn.com
Martie Kutscher (SBN 302650)
mkutscherclark@gibsondunn.com
555 Mission Street, Suite 3000
San Francisco, CA 94105-0921
Telephone: 415.393.8200
Facsimile: 415.393.8306

Attorneys for Defendant Facebook, Inc.,

GIBSON, DUNN & CRUTCHER LLP
Deborah Stein (SBN 224570)
dstein@gibsondunn.com
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.7520

Joshua S. Lipshutz (SBN 242557)
jlipshutz@gibsondunn.com
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Telephone: 202.955.8500
Facsimile: 202.467.0539

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF MARTIE
KUTSCHER IN SUPPORT OF
FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO TEMPORARILY FILE
UNDER SEAL**

I, Martie Kutscher, hereby declare as follows:

1. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bars of California, New Jersey, and New York. I submit this declaration in support of Administrative Motion to Temporarily File Under Seal: (i) Facebook’s Request to Approve Facebook’s Search String Proposal for Custodian Groups 1-4; and (ii) exhibits to the Declaration of Martie Kutscher in Support of Facebook’s Request to Approve Facebook’s Search String Proposal for Custodian Groups 1-4. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. A true and correct copy of Facebook’s Request to Approve Facebook’s Search String Proposal for Custodian Groups 1-4 is attached hereto as **Exhibit 1**.

3. A true and correct copy of Exhibit A to the Declaration of Martie Kutscher in Support of Facebook, Inc.’s Request to Approve Facebook’s Search String Proposal for Custodian Groups 1-4 is attached hereto as **Exhibit 2**.

4. A true and correct copy of Exhibit B to the Declaration of Martie Kutscher in Support of Facebook, Inc.’s Request to Approve Facebook’s Search String Proposal for Custodian Groups 1-4 is attached hereto as **Exhibit 3**.

5. A true and correct copy of Exhibit C to the Declaration of Martie Kutscher in Support of Facebook, Inc.’s Request to Approve Facebook’s Search String Proposal for Custodian Groups 1-4 is attached hereto as **Exhibit 4**.

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 16, 2020 in Palo Alto, California.

/s/ Martie Kutscher

Martie Kutscher